

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA**

<b>JASON KESSLER</b>	:	<b>Case No. 1:18-cv-00015</b>
Plaintiff	:	<b>Judge MOON</b>
	:	
-v-	:	
<b>CITY OF CHARLOTTESVILLE et al.</b>	:	
Defendants	:	

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**BRIEF IN SUPPORT OF MOTION TO WITHDRAW**

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On February 15, 2019 a document (ECF 413) styled “pro-se motion to substitute attorneys Elmer Woodard and James Kolenich” was filed by Mr. James Stern. Mr. Stern did not contact either of undersigned Counsel. However, investigation of Michigan public records revealed that Mr. Stern, although not seeming to be a licensed attorney, did appear to be the lawful owner of National Socialist Movement as of January 2019.

A request for information to Counsel’s main contact with NSM, Mr. Jeff Schoep, yielded an email response that, while a bit ambiguous, did seem to confirm that Mr. Stern is now the leader of NSM, and that did explicitly fire undersigned Counsel as to this case while seeking to retain us in other matters.

Moreover, on February 19, 2019, Mr. Schoep filed a document indicating he would proceed pro-se in this matter. (ECF 418.)

Prior to all of the above, on November 14, 2017, Mr. Schoep filed a declaration<sup>1</sup> with this Court stating that he had been served with process directed to defendant Nationalist Front and explaining his knowledge of what Nationalist Front is and is not. Mr. Schoep attached that declaration to Nationalist Front's motion to dismiss the Plaintiff's complaint.

Since Mr. Schoep has acted on National Front's behalf in this litigation, and since he is the only person to have done so, and since Mr. Schoep has fired undersigned as to the Sines case, it is clear that Mr. Woodard and Mr. Kolenich have been fired by defendant Nationalist Front as well.

Accordingly, Attorneys Elmer Woodard and James E. Kolenich move to withdraw as attorneys for defendants National Socialist Movement, Nationalist Front, and Jeff Schoep.

Respectfully Submitted,

s/ Elmer Woodard  
Elmer Woodard (VSB No. 27734)  
5661 US Hwy 29  
Blairs, VA 24527  
Phone: 434-878-3422  
Email : [isuecrooks@comcast.net](mailto:isuecrooks@comcast.net)  
Attorney for NSM, NF, and Jeff Schoep

s/ James E. Kolenich PHV  
James E. Kolenich (OH 77084)  
KOLENICH LAW OFFICE  
9435 Waterstone Blvd. #140  
Cincinnati, OH 45249  
Phone: 513-444-2150  
Fax: 513-444-2099  
Email: [Jek318@gmail.com](mailto:Jek318@gmail.com)  
Attorney for NSM, NF, and Jeff Schoep

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<sup>1</sup> ECF 105-1 pageID493-494.

CERTIFICATE OF SERVICE

I certify the above was served on February 21, 2019 by the Court's CM/ECF system and upon non ECF participants as follows:

Loyal White Knights of the Ku Klux Klan  
a/k/a Loyal White Knights Church of  
the Invisible Empire, Inc.  
c/o Chris and Amanda Barker  
2634 U.S. HWY 158 E  
Yanceyville, NC 27379

Augustus Sol Invictus  
9823 4<sup>th</sup> Avenue  
Orlando, FL 32824

Fraternal Order of the Alt-Knights  
c/o Kyle Chapman  
52 Lycett Circle  
Daly City, CA 94015

Moonbase Holdings, LLC  
c/o Andrew Anglin  
P.O. Box 208  
Worthington, OH 43085

Andrew Anglin  
P.O. Box 208  
Worthington, OH 43085

East Coast Knights of the Ku Klux Klan  
a/k/a East Coast Knights of the  
True Invisible Empire  
26 South Pine St.  
Red Lion, PA 17356

Elliott Kline [eli.f.mosley@gmail.com](mailto:eli.f.mosley@gmail.com)  
Matthew Heimbach [matthew.w.heimbach@gmail.com](mailto:matthew.w.heimbach@gmail.com)  
Jeff Schoep [commander@newsaxon.org](mailto:commander@newsaxon.org)  
James Stern [jamesstern@thejamesstern.com](mailto:jamesstern@thejamesstern.com)

s/ James E. Kolenich PHV  
James E. Kolenich